

EXHIBIT "E"



Murray, Stone & Wilson, PLLC
One Belmont Avenue
Suite 310
Bala Cynwyd, PA 19004
(215) 947-5300

February 2, 2023

Via Email: lshenk@c-wlaw.com

Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422
(610)567-0700

Re: Torello vs. Platinum Healthcare Group, LLC; Platinum Health at Westgate, LLC d/b/a Westgate Hills Rehabilitation and Nursing Center et al.
United States District Court for the Eastern District of Pennsylvania
Civil Case No.: 2:22-cv-01271

Dear Counsel,

Attached please find Plaintiff's Notices of Depositions directed the following individuals:

- Carmella Kane
- Mark Stern
- Istate Mansaray
- Mary Diamond
- 30(b)(6) Individual Most Knowledgeable about the receipt and flow of revenues into the Facility
- 30(b)(6) Individual Most Knowledgeable about the retention of electronic communications
- 30(b)(6) Individual Most Knowledgeable about Provision of Services at the Facility by Prestige Healthcare A.S. LLC
- Ephraim Morris

As detailed in the enclosed Notices, the depositions will take place from **Tuesday, February 21, 2023** through **Friday February 24, 2023**, via a Zoom video conference. Remote conferencing instructions will be forwarded upon receipt.

If you should have any questions regarding the attached, please do not hesitate to contact me.

Respectfully,
MURRAY, STONE & WILSON, PLLC

/s/ Matthew T. Stone
Matthew T. Stone, Esquire
mstone@mswlawgroup.com

MTS/jh
Enclosure

CC: Jonathan D. Levitan, Esquire (via email w/ encl: Jonathan@jdlevitanlaw.com)
Mark A. Humphrey, Esquire (via email w/ encl: mark@humphreylawgroup.com)

MURRAY, STONE & WILSON, PLLC

Matthew T. Stone, Esquire
Attorney Identification No. 206409
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Bala Cynwyd, Pennsylvania 19004
Phone: (215) 947-5300
Email: mstone@mswlawgroup.com

THIS IS NOT AN ABRITRATION
CASE. ASSESSMENT OF DAMAGES
IS REQUIRED; JURY TRIAL DEMANDED.

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

NANCY P. TORELLO, as Administratrix for
the ESTATE OF RAMON J. TORELLO,
deceased

Plaintiff,

-vs-

PLATINUM HEALTHCARE GROUP, LLC;
PLATINUM HEALTH AT WESTGATE,
LLC, d/b/a WESTGATE HILLS
REHABILITATION AND NURSING
CENTER; APEX GLOBAL SOLUTIONS,
LLC; APEX HEALTHCARE PARTNERS,
LLC; VINTAGE HEALTHCARE, LLC;
PLATINUM HOLDINGS, LLC; 2050 OLD
WEST CHESTER PIKE, LLC; JACOB
KARMEL; and NATHAN STERN,

Defendants.

Civil No. 22-cv-1271

**NOTICE OF DEPOSITION
DIRECTED TO CARMELLA KANE**

TO: **CARMELLA KANE**
c/o Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422

Please take notice that Plaintiff Nancy P. Torello, as Administratrix for the Estate of Ramon J. Torello, deceased, by and through her counsel, Murray, Stone & Wilson, PLLC, will take the video deposition upon oral examination in accordance with the Federal Rules of Civil

Procedure of **CARMELLA KANE** on **Tuesday, February 21, 2023**, beginning at **10:00 a.m.**,
via Zoom, with respect to all matters relevant to the within action.

The witness is instructed to bring to the deposition the following: (i) current resumé or curriculum vitae.

This deposition will be taken pursuant to the Federal Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, will continue from day to day until completed, and will be recorded by videographic and stenographic means.

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing

Notice of Deposition was served on counsel for the Defendants via electronic mail, as follows:

Lois M. Shenk, ID No. 42455
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422
(610) 567-0700

Email: lshenk@c-wlaw.com

*Attorneys for Defendants, Platinum Healthcare at Westgate, LLC d/b/a Westgate Hills and
Vintage Healthcare, LLC*

Jonathan D. Levitan, Esquire
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430 Williams Road
Wynnewood, PA 19096

Email: Jonathan@jdlevitanlaw.com

*Attorney for Defendants, Apex Global Solutions LLC, Apex Healthcare Partners LLC, Jacob
Karmel, and Nathan Stern*

Mark A. Humphrey
Humphrey Law Group
1173 Spring Centre Blvd South C
Altamonte Springs, FL 32714
Email: mark@humphreylawgroup.com

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

MURRAY, STONE & WILSON, PLLC

Matthew T. Stone, Esquire
Attorney Identification No. 206409
One Belmont Avenue, Suite 310
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Email: mstone@mswlawgroup.com

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT FOR THE
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NANCY P. TORELLO, as Administratrix for
the ESTATE OF RAMON J. TORELLO,
deceased

Plaintiff,

-vs-

PLATINUM HEALTHCARE GROUP, LLC;
PLATINUM HEALTH AT WESTGATE,
LLC, d/b/a WESTGATE HILLS
REHABILITATION AND NURSING
CENTER; APEX GLOBAL SOLUTIONS,
LLC; APEX HEALTHCARE PARTNERS,
LLC; VINTAGE HEALTHCARE, LLC;
PLATINUM HOLDINGS, LLC; 2050 OLD
WEST CHESTER PIKE, LLC; JACOB
KARMEL; and NATHAN STERN,

Defendants.

Civil No. 22-cv-1271

**NOTICE OF DEPOSITION
DIRECTED TO ISTATE MANSARAY**

TO: **ISTATE MANSARAY**
c/o Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422

Please take notice that Plaintiff Nancy P. Torello, as Administratrix for the Estate of Ramon J. Torello, deceased, by and through her counsel, Murray, Stone & Wilson, PLLC, will take the video deposition upon oral examination in accordance with the Federal Rules of Civil

Procedure of **ISTATE MANSARAY** on **Wednesday, February 22, 2023**, beginning at **10:00 a.m.**, via Zoom, with respect to all matters relevant to the within action.

The witness is instructed to bring to the deposition the following: (i) current resumé or curriculum vitae.

This deposition will be taken pursuant to the Federal Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, will continue from day to day until completed, and will be recorded by videographic and stenographic means.

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing

Notice of Deposition was served on counsel for the Defendants via electronic mail, as follows:

Lois M. Shenk, ID No. 42455
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Email: lshenk@c-wlaw.com

*Attorneys for Defendants, Platinum Healthcare at Westgate, LLC d/b/a Westgate Hills and
Vintage Healthcare, LLC*

Jonathan D. Levitan, Esquire
The Law Office of Jonathan D. Levitan, LLC
430 Williams Road
Wynnewood, PA 19096

Email: Jonathan@jdlevitanlaw.com

*Attorney for Defendants, Apex Global Solutions LLC, Apex Healthcare Partners LLC, Jacob
Karmel, and Nathan Stern*

Mark A. Humphrey
Humphrey Law Group
1173 Spring Centre Blvd South C
Altamonte Springs, FL 32714
Email: mark@humphreylawgroup.com

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

MURRAY, STONE & WILSON, PLLC

Matthew T. Stone, Esquire
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One Belmont Avenue, Suite 310
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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT FOR THE
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NANCY P. TORELLO, as Administratrix for
the ESTATE OF RAMON J. TORELLO,
deceased

Plaintiff,

-vs-

PLATINUM HEALTHCARE GROUP, LLC;
PLATINUM HEALTH AT WESTGATE,
LLC, d/b/a WESTGATE HILLS
REHABILITATION AND NURSING
CENTER; APEX GLOBAL SOLUTIONS,
LLC; APEX HEALTHCARE PARTNERS,
LLC; VINTAGE HEALTHCARE, LLC;
PLATINUM HOLDINGS, LLC; 2050 OLD
WEST CHESTER PIKE, LLC; JACOB
KARMEL; and NATHAN STERN,

Defendants.

Civil No. 22-cv-1271

**NOTICE OF DEPOSITION
DIRECTED TO MARK STERN**

TO: **MARK STERN**
c/o Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422

Please take notice that Plaintiff Nancy P. Torello, as Administratrix for the Estate of Ramon J. Torello, deceased, by and through her counsel, Murray, Stone & Wilson, PLLC, will take the video deposition upon oral examination in accordance with the Federal Rules of Civil

Procedure of **MARK STERN** on **Tuesday, February 21, 2023**, beginning at **1:00 p.m.**, via Zoom, with respect to all matters relevant to the within action.

The witness is instructed to bring to the deposition the following: (i) current resumé or curriculum vitae.

This deposition will be taken pursuant to the Federal Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, will continue from day to day until completed, and will be recorded by videographic and stenographic means.

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

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The undersigned hereby certifies that a true and correct copy of the foregoing

Notice of Deposition was served on counsel for the Defendants via electronic mail, as follows:

Lois M. Shenk, ID No. 42455
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422
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Email: lshenk@c-wlaw.com

*Attorneys for Defendants, Platinum Healthcare at Westgate, LLC d/b/a Westgate Hills and
Vintage Healthcare, LLC*

Jonathan D. Levitan, Esquire
The Law Office of Jonathan D. Levitan, LLC
430 Williams Road
Wynnewood, PA 19096

Email: Jonathan@jdlevitanlaw.com

*Attorney for Defendants, Apex Global Solutions LLC, Apex Healthcare Partners LLC, Jacob
Karmel, and Nathan Stern*

Mark A. Humphrey
Humphrey Law Group
1173 Spring Centre Blvd South C
Altamonte Springs, FL 32714
Email: mark@humphreylawgroup.com

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

MURRAY, STONE & WILSON, PLLC

Matthew T. Stone, Esquire
Attorney Identification No. 206409
One Belmont Avenue, Suite 310
Bala Cynwyd, Pennsylvania 19004
Phone: (215) 947-5300
Email: mstone@mswlawgroup.com

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IS REQUIRED; JURY TRIAL DEMANDED.

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

NANCY P. TORELLO, as Administratrix for
the ESTATE OF RAMON J. TORELLO,
deceased

Plaintiff,

-vs-

PLATINUM HEALTHCARE GROUP, LLC;
PLATINUM HEALTH AT WESTGATE,
LLC, d/b/a WESTGATE HILLS
REHABILITATION AND NURSING
CENTER; APEX GLOBAL SOLUTIONS,
LLC; APEX HEALTHCARE PARTNERS,
LLC; VINTAGE HEALTHCARE, LLC;
PLATINUM HOLDINGS, LLC; 2050 OLD
WEST CHESTER PIKE, LLC; JACOB
KARMEL; and NATHAN STERN,

Defendants.

Civil No. 22-cv-1271

**NOTICE OF DEPOSITION
DIRECTED TO 30(b)(6) THE
INDIVIDUAL MOST
KNOWLEDGEABLE ABOUT THE
RECEIPT AND FLOW OF
REVENUES INTO THE FACILITY**

TO: **30(b)(6)THE INDIVIDUAL MOST KNOWLEDGEABLE ABOUT THE RECEIPT AND
FLOW OF REVENUES INTO THE FACILITY**

c/o Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422

Please take notice that Plaintiff Nancy P. Torello, as Administratrix for the Estate of
Ramon J. Torello, deceased, by and through her counsel, Murray, Stone & Wilson, PLLC, will
take the video deposition upon oral examination in accordance with the Federal Rules of Civil

Procedure of 30(b)(6) the individual Most Knowledgeable about the receipt and flow of revenues into the Facility on **Thursday, February 23, 2023**, beginning at **10:00 a.m.**, via Zoom, with respect to all matters relevant to the within action.

The witness is instructed to bring to the deposition the following: (i) current resumé or curriculum vitae.

This deposition will be taken pursuant to the Federal Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, will continue from day to day until completed, and will be recorded by videographic and stenographic means.

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing

Notice of Deposition was served on counsel for the Defendants via electronic mail, as follows:

Lois M. Shenk, ID No. 42455
450 Sentry Parkway; Suite 200
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*Attorneys for Defendants, Platinum Healthcare at Westgate, LLC d/b/a Westgate Hills and
Vintage Healthcare, LLC*

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Email: Jonathan@jdlevitanlaw.com

*Attorney for Defendants, Apex Global Solutions LLC, Apex Healthcare Partners LLC, Jacob
Karmel, and Nathan Stern*

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Humphrey Law Group
1173 Spring Centre Blvd South C
Altamonte Springs, FL 32714
Email: mark@humphreylawgroup.com

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

MURRAY, STONE & WILSON, PLLC

Matthew T. Stone, Esquire
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One Belmont Avenue, Suite 310
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Attorneys for Plaintiff

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-vs-

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LLC, d/b/a WESTGATE HILLS
REHABILITATION AND NURSING
CENTER; APEX GLOBAL SOLUTIONS,
LLC; APEX HEALTHCARE PARTNERS,
LLC; VINTAGE HEALTHCARE, LLC;
PLATINUM HOLDINGS, LLC; 2050 OLD
WEST CHESTER PIKE, LLC; JACOB
KARMEL; and NATHAN STERN,

Defendants.

Civil No. 22-cv-1271

**NOTICE OF DEPOSITION
DIRECTED TO MARY DIAMOND**

TO: **MARY DIAMOND**
c/o Lois M. Shenk, Esquire
450 Sentry Parkway; Suite 200
Blue Bell, PA 19422

Please take notice that Plaintiff Nancy P. Torello, as Administratrix for the Estate of Ramon J. Torello, deceased, by and through her counsel, Murray, Stone & Wilson, PLLC, will take the video deposition upon oral examination in accordance with the Federal Rules of Civil

Procedure of **MARY DIAMOND** on **Wednesday, February 22, 2023**, beginning at **1:00 p.m.**,
via Zoom, with respect to all matters relevant to the within action.

The witness is instructed to bring to the deposition the following: (i) current resumé or curriculum vitae.

This deposition will be taken pursuant to the Federal Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, will continue from day to day until completed, and will be recorded by videographic and stenographic means.

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire

CERTIFICATE OF SERVICE

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Email: Jonathan@jdlevitanlaw.com

*Attorney for Defendants, Apex Global Solutions LLC, Apex Healthcare Partners LLC, Jacob
Karmel, and Nathan Stern*

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Email: mark@humphreylawgroup.com

MURRAY, STONE & WILSON, PLLC
Attorneys for Plaintiff

Date: February 2, 2023

By: /s/ Matthew T. Stone
Matthew T. Stone, Esquire